



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

E.H. & R.S.  
MAY 21 2009

MAY 18 2009

Ms. Mary Lou Capichioni  
Director  
Remediation Services  
Corporate Environmental Services  
The Sherwin-Williams Company  
101 Prospect Avenue, N.W.  
Cleveland, OH 44115-1075

Re: EPA's review of the Sherwin-Williams Company April 29, 2009 *Route 561 Dump Site Groundwater Investigation* – Technical Memo  
The Sherwin-Williams Company Sites –RI/FS Activities  
Gibbsboro, New Jersey  
Administrative Order Index No. II CERCLA-02-99-2035

Dear Ms. Capichioni:

The U.S. Environmental Protection Agency (EPA) has reviewed the April 29, 2009 *Route 561 Dump Site Groundwater Investigation* (Route 561 Dump Site Technical Memo) and offers the following comments.

EPA approves the field activities which are specified in the April 29, 2009 Route 561 Dump Site Technical Memo, but requests that the following items be addressed:

1. EPA requests to be present for the final selection of the 3 proposed pore water sample locations.
2. EPA requests that additional clarification be provided in regards to the proposed collection of purge water during monitoring well installation operations, as currently described in Appendix A, Page A-12 of the Route 561 Dump Site Technical Memo. The text currently states that purge water will be collected in 55-gallon drums. This is contrary to previous discussions with Sherwin-Williams when discussing the fate of purge water during monitoring well re-development activities at the Former Manufacturing Plant (FMP). Please ensure that proper protocols are utilized and accurately presented in the Technical Memo.
3. It is stated in Appendix A (Page A-13) that monitoring well samples will be collected for: Contract Laboratory Program (CLP) analyses for TAL metals, cyanide, total organic carbon (TOC), total dissolved solids (TDS) and total suspended solids (TSS). EPA is requesting that all wells be sampled and analyzed for full-scan parameters.

4. An "un-signed" copy of EPA's August 14, 2007 Comment Letter (on Response to EPA Letter dated August 7, 2006 – Appendix A ((*Dump Site Groundwater Investigation – November 30, 2006*))) was submitted as part of the Route 561 Dump Site Groundwater Technical Memo. Please submit the official signed copy that was mailed to the Sherwin-Williams Company on August 14, 2007.

If you have any questions on this matter, you may contact Mr. Ray Klimcsak, at (212) 637-3916, or if you have any legal concerns, Mr. Carl Howard, Esq., at (212) 637-3216.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Carole Petersen", written in dark ink.

Carole Petersen, Chief  
New Jersey Remediation Branch

cc: J. Doyon, NJDEP